

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LESLIE DICK WORLDWIDE, LTD. and :
LESLIE DICK, :
 Plaintiffs, :
 v. :
GEORGE SOROS, SOROS FUND :
MANAGEMENT, LLC, SFM :
MANAGEMENT, LLC, CONSECO, INC., :
VORNADO REALTY TRUST, GERMAN :
AMERICAN CAPITAL CORPORATION, :
DEUTSCHE BANK AG, EASTDIL :
SECURED, LLC, HARRY MACKLOWE, :
FIG, LLC, CERBERUS CAPITAL :
MANAGEMENT, LP, LAZARD FRERES & :
CO. LLC, KIRKLAND & ELLIS, LLP, FRIED :
FRANK HARRIS SHRIVER & JACOBSON :
LLP, CARMEL FIFTH, LLC, 767 MANAGER :
LLC, DONALD J. TRUMP and JOHN DOES :
“1” THROUGH “10,” :
 Defendants. :
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NOTICE OF MOTION TO DISMISS PLAINTIFFS’ COMPLAINT

PLEASE TAKE NOTICE that, upon the Complaint, the accompanying Declaration of Robert J. Giuffra, Jr., the accompanying Memorandum of Law in Support of Defendant Vornado Realty Trust’s Motion to Dismiss and the memoranda filed concurrently herewith by the other defendants to this action in support of their motions to dismiss, Vornado Realty Trust will move this Court, pursuant to Rules 12(b)(6) and 9(b) of the Federal Rules of Civil Procedure, before the Honorable Barbara S. Jones, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a time and place to be determined by the Court, for

an Order dismissing plaintiff's complaint in its entirety, and for such further and other relief that the Court may deem just and proper.

Respectfully submitted,



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Counsel for Defendant Vornado Realty Trust

December 22, 2008

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